## Message

From: Gallo, Patty (CONTR) [Patty.Gallo@lm.doe.gov]

**Sent**: 5/4/2017 8:02:46 PM

To: Moritz, Vera [Moritz. Vera@epa.gov]; 'lindsay.masters@state.co.us' [lindsay.masters@state.co.us']; ''Carl Spreng

(carl.spreng@state.co.us)' (carl.spreng@state.co.us)' [carl.spreng@state.co.us]

CC: Kaiser, Linda (CONTR) [Linda.Kaiser@lm.doe.gov]; Ward, David (CONTR) [David.Ward@lm.doe.gov]; Surovchak, Scott

[Scott.Surovchak@lm.doe.gov]; Murl, Jeffrey [Jeffrey.Murl@lm.doe.gov]

**Subject**: Revised Appendix I files

Attachments: Appendix I\_Public Input\_May 3.docx; Stakeholder Input\_Crosswalk.xlsx

All:

Please find attached the following files for your review:

Revised Appendix I Response to Stakeholder Input table. This is a track changes version incorporating (1)
 Lindsay's comments and (2) Martha Hyder's comments on the air monitoring response only (Group Topic D in the table).

2. Crosswalk. This Excel file contains the crosswalk between the input letters and Appendix I. One of the reasons for creating this file was to document how the individual input was grouped and to ensure we have adequately addressed the input – whether as a grouped response or an individual response. I have marked a few passages (in red) throughout the spreadsheet that I would like your thoughts on regarding whether we addressed the particular input sufficiently in the response. The second column (Number) in the Crosswalk spreadsheet refers to the original source letters, which have been hand-marked with these numbers to track the input. PDF files of the four letters with the hand-written numbers in the margins have been placed on the EFT site for your reference.

Please feel free to call me to discuss if anything is unclear. Thanks.



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From: Gallo, Patty (CONTR)

**Sent:** Wednesday, May 03, 2017 12:43 PM

To: 'Moritz, Vera'

Cc: 'Carl Spreng (carl.spreng@state.co.us)' (carl.spreng@state.co.us); lindsay.masters@state.co.us; Kaiser, Linda

(CONTR); Ward, David (CONTR); Surovchak, Scott; Murl, Jeffrey; Hanson, Michelle (CONTR)

**Subject:** RE: EPA questions on Appendix C of draft FYR report

Thank you Vera. I will make sure these changes are incorporated into the final FYR report.

Here is the status of the other FYR items we are currently working on:

- <u>Site Inspection Checklist.</u> We have completed the Site Inspection Checklist as you requested, and are making some final edits. I will send it to the team for review in the near future.
- <u>Appendix I.</u> I have incorporated Lindsay's additional comments to Appendix I (emailed on 4/25/17) and added what I have named a 'Literature Cited' group topic to the table, as discussed yesterday. I will send the newest version of Appendix I to the team when I send the 'crosswalk' (below).
- Appendix I Crosswalk. I am checking the final 'crosswalk' for the stakeholder responses, which will also be forward to the team for review. For the benefit of the others on the team, this 'crosswalk' is an Excel file that shows the connection between individual statements made in the stakeholder input letters and the table that will comprise Appendix I. This will allow us to trace the final response provided in the FYR report to the original input received. The crosswalk will not be included in Appendix I, but will be placed in the project files.
- <u>Literature Cited Backup Documentation</u>. I am currently writing the backup documentation for the 'Literature Cited' group topic, as we discussed yesterday. This is the backup documentation that supports our conclusion that none of the literature cited in the stakeholder input affects the conclusions of the FYR. This documentation will not be included in Appendix I, but will be placed in the project files.



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From: Moritz, Vera [mailto:Moritz.Vera@epa.gov]
Sent: Wednesday, May 03, 2017 11:03 AM

**To:** Gallo, Patty (CONTR)

Cc: 'Carl Spreng (<arl.spreng@state.co.us') (<arl.spreng@state.co.us'); <a href="mailto:lindsay.masters@state.co.us">lindsay.masters@state.co.us</a>; Kaiser, Linda (CONTR); Ward, David (CONTR); Surovchak, Scott; Murl, Jeffrey; Valenti, John (CONTR); McDonald, Michael (CONTR)</a>

**Subject:** RE: EPA questions on Appendix C of draft FYR report

Patty - many thanks for the clarifications -

#1. – good clarification as suggested to include in Section C3.2

#2. – just a footnote stating – "Figure C-6 shows the 2017 DEFAULT input values from the EPA PRG calculator" is sufficient

#3 - agree with the suggestion

Vera Moritz Remedial Project Manager (RPM) EPA Region 8 – Federal Facilities 303-312-6981 Moritz.vera@epa.gov

PS – Starting to get comments on the 5YR text from various HQ folks [between you and me, it's like herding cats!]. Pat S. and I will triage and consolidate comments.

From: Gallo, Patty (CONTR) [mailto:Patty.Gallo@lm.doe.gov]

**Sent:** Tuesday, May 2, 2017 2:43 PM **To:** Moritz, Vera < <u>Moritz.Vera@epa.gov</u>>

**Cc:** 'Carl Spreng (<u>carl.spreng@state.co.us</u>)' (<u>carl.spreng@state.co.us</u>) < <u>carl.spreng@state.co.us</u>>; lindsay.masters@state.co.us; Kaiser, Linda (CONTR) < Linda.Kaiser@lm.doe.gov>; Ward, David (CONTR)

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Subject: EPA questions on Appendix C of draft FYR report

Vera,

Below is the email with your questions on *Appendix C, Risk Assessment Review for COU, POU, and OU3* that I forwarded to the gentlemen that worked on the radiological portion of the appendix. I based the questions (in purple) on our phone conversation – please let me know if I missed anything or misinterpreted your questions. I've inserted the responses and some clarifications/thoughts.

EPA has asked us to provide information on the following (all figure/table references are from the draft RF FYR report Appendix C):

- 1. EPA liked that we provided the input parameters from 1994 in Figure C-5 (OU3 evaluation) and would like us to provide a similar figure for the POU evaluation. She was particularly interested in the list of input parameters used in the equation, which enabled her to do some comparison between 1994 and 2017. The attached screen shot includes the input parameters used in the development of the 2002 radionuclide soil action levels (RSALs). I will add this directly to Section C3.2 POU discussion (or put the information into a table in this section). To develop the RSALs in 2002, they used 33 years as the exposure duration in the rural resident scenario (26 for an adult and 7 for a child). To do the comparison for the FYR, we input the same exposure durations in the 2017 EPA PRG calculator using a residential scenario. (FYI...we used the 2002 RSAL inputs because they were the most recent values calculated using a residential scenario the PRGs calculated to support the 2006 CRA were for the WRV and WRW.)
- 2. Figures C-5 and C-6. Can we provide an explanation for why the 1994 resident exposure duration was 30 years (Fig. C-5) and the 2017 PRG calculator exposure duration was 26 (6 plus 20) years (Fig. C-6)? These figures are found in the OU3 discussion in Section C4.1 of Appendix C. Figure C-5 shows an exposure duration of 30 years. We also used 30 years as the exposure duration input value in our calculations for the FYR. Figure C-6 shows the 2017 DEFAULT input values from the EPA PRG calculator not the site-specific values we input. So the exposure duration of 20 years for an adult resident and 6 years for a child resident shown in the equations in Figure C-6 are EPA PRG calculator default values. To rectify this, I can either delete Figure C-6 or attempt to explain it more clearly in the text of Section C4.1. (I was told that the PRG calculator does not readily allow you to print the equations showing the site-specific input values, however, we can explore that further if that is your preference.)

3. Table C-14. This table only lists Pu-239, not Pu-239/240. The concern is that Pu-239/240 is named as a COC in the first paragraph C3.2, but the table only shows Pu-239. Can we clarify why we only show Pu-239 in the table – perhaps the 2002 report that we got the PRGs from only listed Pu-239? If so, is there any way to address this? This table is found in the POU discussion in Section C3.2 of Appendix C. The reason only Pu-239 (and not Pu-239/240) is listed in the table is because the source document for the 2002 rural resident PRGs (RSALs) only discusses Pu-239. Our radiological staff re-ran the PRG calculation for Pu-240 and the resulting PRG is essentially the same as that calculated for Pu-239. To address this, it was recommended we leave the table 'as is', and add a statement in the text of Section C3.2 to make it clear that the 2002 PRG source document did not include Pu-240.

I wanted to document your comments and my discussion with our radiological staff in this email, however, it may be easier to discuss over the phone. Please call if you would like to discuss. Thanks



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